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*Attorneys for Defendants  
Don C. Keenan; D.C. Keenan & Associates, P.A.; and  
William Entrekin*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SEAN K. CLAGGETT & ASSOCIATES, LLC  
D/B/A CLAGGETT & SYKES LAW FIRM, A  
NEVADA LIMITED LIABILITY COMPANY;  
SEAN K. CLAGGETT, AN INDIVIDUAL

Plaintiffs,

v.

DON C. KEENAN, AN INDIVIDUAL; D.C.  
KEENAN & ASSOCIATES, P.A. D/B/A  
KEENAN LAW FIRM, A GEORGIA  
PROFESSIONAL ASSOCIATION; KEENAN'S  
KIDS FOUNDATION, INC., D/B/A KEENAN  
TRIAL INSTITUTE AND/OR THE KEENAN  
EDGE, A GEORGIA NON-PROFIT  
CORPORATION; BRIAN F. DAVIS, AN  
INDIVIDUAL; DAVIS LAW GROUP, P.A., A  
NORTH CAROLINA PROFESSIONAL  
ASSOCIATION; DAVID J. HOEY, AN  
INDIVIDUAL; TRAVIS E. SHTLER, AN  
INDIVIDUAL; WILLIAM ENTREKIN, AN  
INDIVIDUAL; DOES I-X; AND ROE  
BUSINESS ENTITIES XI-XX, INCLUSIVE,

Defendants.

Case No.: 2:21-cv-02237-GMN-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND  
DEFENDANTS DON C. KEENAN,  
D.C. KEENAN & ASSOCIATES,  
P.A., AND WILLIAM ENTREKIN'S  
TIME TO RESPOND TO  
PLAINTIFFS' MOTION TO  
REMAND [ECF NO. 13]**

Plaintiffs, SEAN K. CLAGGETT & ASSOCIATES, LLC d/b/a CLAGGETT &  
SYKES LAW FIRM and SEAN K. CLAGGETT (collectively "Plaintiffs") and Defendants

DON C. KEENAN D.C., KEENAN & ASSOCIATES, P.A., and WILLIAM ENTREKIN (collectively "Defendants"), by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS counsel for the Defendants subject to this stipulation must withdraw from representation due to a previously unknown conflict, and successor counsel is expected to appear in the near future;

Plaintiffs' SEAN K. CLAGGETT & ASSOCIATES, LLC d/b/a CLAGGETT & SYKES LAW FIRM and SEAN K. CLAGGETT hereby stipulate and agree that Defendants, DON C. KEENAN D.C., KEENAN & ASSOCIATES, P.A., and WILLIAM ENTREKIN, shall have a ten (10) day extension of time in which to respond to Plaintiffs' *Motion to Remand* filed January 14, 2022, in the above-captioned matter, with the new date to respond to said motion through and including **Monday, February 7, 2022**.

IT IS SO AGREED as stated above.

DATED this 28th day of January, 2022.

DATED this 28th day of January, 2022.

INJURY LAWYERS OF NEVADA

LIPSON NEILSON P.C.

/s/ Jared B. Anderson

/s/ Joseph P. Garin

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*Attorneys for Plaintiffs*

*Attorneys for Defendants*

**IT IS SO ORDERED.**

*Don C. Keenan; D.C. Keenan & Associates, P.A.; and William Entekin*

Dated this 31 day of January, 2022

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

Case No.: 2:21-cv-02237-GMN-DJA

**ORDER**

The stipulation of counsel to extend Defendants' DON C. KEENAN D.C., KEENAN & ASSOCIATES, P.A., and WILLIAM ENTREKIN time to respond to Plaintiffs' Motion for Remand is hereby approved and so ORDERED.

\_\_\_\_\_  
United States Magistrate Judge

Dated:\_\_\_\_\_

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